

**APPENDIX 12B. MANUFACTURER IMPACT ANALYSIS
SMALL BUSINESS INTERVIEW GUIDE**

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**Distribution Transformer
Energy Conservation Standards Rulemaking
Manufacturer Impact Analysis Interview Guide for Small Businesses**

- 1. Are you aware of the US Department of Energy’s on-going rulemaking to establish national minimum efficiency standards for distribution transformers?¹ Would you like to be added to the DOE’s email database for updates relating to this rulemaking?**
- 2. We are assessing the potential impacts of a potential minimum efficiency standard on small businesses. Is your company a small business (defined as less than 750 employees, including all subsidiaries and parent companies, and employees in all countries where you operate)?**
- 3. Does your company manufacture LV dry-type, MV dry-type, and/or liquid-immersed distribution transformers? How many different kVA ratings and designs do you produce within these three major groupings?**
- 4. Are you familiar with NEMA’s TP-1 / the ENERGY STAR voluntary standard? Are any of your products TP-1 compliant? If so, what percent of your sales does this represent?**
- 5. Would a TP-1 standard, mandated by the US DOE (whereby all your competitors would also required to meet the same standard), cause any burdens on your business?**
- 6. What if the US DOE required an efficiency standard higher than TP-1? Would that change your answer to #5? Please consider costs such as new designs, capital investment, prototype testing, and marketing that might be required.**
- 7. Are there any reasons that a small business such as yours might be at a competitive disadvantage relative to a larger business under mandatory efficiency standards? Please consider such factors as technical expertise, capital budgets, bulk purchasing power for material inputs (e.g., electrical steels), etc.**
- 8. Would the Department’s proposed test procedure impose an undue burden on small business (explanation required)?² Please consider such factors as technician time, statistical expertise, reporting burden, etc.**

¹ For information on the US DOE’s efficiency standards rulemaking for distribution transformers, visit:
http://www.eere.energy.gov/buildings/appliance_standards/commercial/distribution_transformers_anopr.html

² For information on the US DOE’s draft test procedure for distribution transformers, visit:
http://www.eere.energy.gov/buildings/appliance_standards/commercial/distribution_transformers_snopr.html